fluidly coupling a fluid inlet to one end of the fluid flow path and a fluid outlet to the other end of the fluid flow path wherein fluid in the fluid flow path absorbs heat from the thermally conductive mass, the heat imparted to the mass by the at least one heater element.

19. (Previously Presented) The method of claim 18 further comprising:

fixedly attaching an electrical ground plate on the mold cavity before introducing the thermally conductive material to establish a common ground through the heater means with the thermally conductive mass.

20. (Previously Presented) The heater apparatus of claim 14, wherein the electrical ground member is fixedly attached to the heating means and establishes a common ground through the heating means with the thermally conductive mass.

21. (Previously Presented) The heater apparatus of claim 20, wherein at least a portion of the electrical ground member is mounted in the thermally conductive mass.

22. (Previously Presented) The heater apparatus of claim 20, wherein at least a portion of the electrical ground member is insert molded in the thermally conductive mass.

REMARKS

In the Office Action dated April 28, 2009, claims 1, 2, 8, 9, 12-15, and 17-22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud, claims 16 and 19-22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud and common knowledge, claims 3 and 4 are rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud and in further view of Cassidy, and claims 5-7, 10 and 11 are rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud in further view of Roechitelli. With this Amendment, Applicants have amended claims 1, 15 and 18. After entry of this Amendment, claims 1-22 are pending in the Application.

Claims 1, 2, 8, 9, 12-15 and 17-22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud. Independent claims 1, 15 and 18 (and claims 2, 8, 9, 12-14, 17 and 19-22 by their dependency) all recite in part a thermally conductive mass having a fluid flow path including a first channel and a second channel formed in series therein, the first channel in fluid communication with the second channel, the fluid flow path running between an inlet and an outlet with the heating means disposed between the first and second channels.

The Examiner has not made a *prima facie* case of obviousness as neither Gusmer nor Bochud discloses a fluid flow path including a first channel and a second channel formed in series therein, the first channel in fluid communication with the second channel, the fluid flow path running between an inlet and an outlet with the heating means disposed between the first and second channels.

Gusmer teaches a heat exchanger comprising a pair of metal heater blocks 1. Each heater block has a fluid inlet 9 and a fluid outlet 11. Grooves 7 all communicate at one end with the liquid inlet 9 and at the other end with the liquid outlet 11. (Col. 2, lines 4-8). In other words, fluid enters the inlet and is divided into the grooves, which run parallel and across the block, where the fluid joins to exit the outlet. The fluid is separated to travel a short distance on one side of the heating element. Applicants' claims recite a fluid flow path wherein the fluid enters a first channel that runs along one side of the heating element and then enters the second channel that runs along another side of the heating element. The fluid

does not exit the mass as it travels through the first and second channels. The same fluid passes through a substantially longer path on two sides of the heating element for more efficient heating.

Bochud as well does not teach or suggest a fluid flow path including a first channel and a second channel formed in series therein, the first channel in fluid communication with the second channel, the fluid flow path running between an inlet and an outlet with the heating means disposed between the first and second channels. Bochud discloses die cast aluminum entirely surrounding the heating bodies 2, 3. Bochud further discloses a stainless steel receptacle 7 which the water enters to be heated by the heating bodies 2, 3. As clearly seen in the figures of Bochud, there is no fluid flow path having first and second channels, and no fluid flow path open to the exterior of the mass. The heating means is disposed on one side of the receptacle rather than in between channels. Water enters the receptacle and steam exits.

Accordingly, Applicants respectfully submit that claims 1, 15 and 18 are in condition for allowance, notice of which is requested.

Claims 2, 8, 9, 12-14 and 17 depend either directly or indirectly from independent claims 1 and 15 to include all of the limitations therein. For at least this reason, claims 2, 8, 9, 12-14 and 17 are in condition for allowance, notice of which is requested.

Claim 16 is rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud and common knowledge. Claim 16 depends from claim 15 to include all of the limitations therein. For at least this reason, claim 16 is in condition for allowance, notice of which is requested.

Claims 3 and 5 are rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud and in further view of Cassidy. Cassidy fails to teach, disclose or render obvious a fluid flow path including a first channel and a second channel formed in series therein, the first channel in fluid communication with the second channel, the fluid flow path running between an inlet and an outlet with the heating means disposed between the first and second channels. Therefore, Cassidy fails to cure the deficiency of the Gusmer/Bochud combination. Claims 3 and 5 depend from claim 1 to include all of the

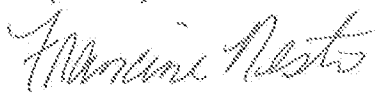
limitations therein. For at least this reason, claims 3 and 5 are in condition for allowance, notice of which is requested.

Claims 5-7, 10 and 11 are rejected under 35 U.S.C. §103(a) as being unpatentable over Gusmer in view of Bochud in further view of Rocchitelli. Rocchitelli fails to teach, disclose or render obvious a fluid flow path including a first channel and a second channel formed in series therein, the first channel in fluid communication with the second channel, the fluid flow path running between an inlet and an outlet with the heating means disposed between the first and second channels. Rocchitelli discloses a flat thermistor on one side of the fluid path. Thus, Rocchitelli fails to cure the deficiencies of the Gusmer/Bochud combination. Claims 5-7, 10 and 11 depend from claim 1 to include all of the limitations therein. For at least this reason, claims 5-7, 10 and 11 are in condition for allowance, notice of which is requested.

It is submitted that this Amendment has antecedent basis in the application as originally filed, including the specification, claims and drawings, and that this Amendment does not add any new subject matter to the application. Reconsideration of the application as amended is requested. It is respectfully submitted that this Amendment places the application in suitable condition for allowance; notice of which is requested.

If the Examiner feels that prosecution of the present application can be expedited by way of an Examiner's amendment, the Examiner is invited to contact the Applicant's attorney at the telephone number listed below.

Respectfully submitted,



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